# EXHIBIT "A"

**Asserted by Pacific Gas and Electric Company, hereinafter ("PG&E"), in quote marks:**

1. "Hinkley Aquifer that is the source of Plaintiff's well water meets the definition of a USDW in Part C of the SDWA, because Plaintiff alleges that it currently supplies drinking water for human consumption, and it contains ground water in a sufficient quantity that it *could* supply a Public Water System (given that it supplies the more than 25 "similarly situated Plaintiffs")".

Ex. 6 - Personal Privacy **strikes the asserted therein Paragraph 1 by PG&E as follows:**

The Safe Drinking Water Act (SDWA) 42 U.S.C. §300f, et seq., inclusive of all AMENDMENDMENTS TO SDWA, explicitly codify into law the "PUBLIC WATER SYSTEM" ("PWS") and not "INDIVIDUAL PRIVATE WATER WELL", whether such well is for one person, or millions of persons individually own such wells, but individually own one such well, as long as is classified only as "Individual Private Water Well", and/or whether such well belongs to one Plaintiff or millions of similarly situated Plaintiffs, who individually own such individual private water well. (Nick Panchev did not asserted that).

WHEREFORE, PG&E has wantonly and unscrupulously twisted-circumvented the SDWA, in the entirety, and THEREFORE PG&E is in a legal contempt of the Congressional intent, inclusive but not limited to in legal contempt and misrepresentations of United States Environmental Protection Agency delegated authorities.

**THEREFORE, it is warrant to issue subpoena on PG&E by Congress and by USEPA, to interpret the Statute 42 U.S.C. §300f, et seq., in the entirety, and not limited to Congressional Hearing and hearing before USEPA. Nick Panchev should be constitutionally entitled to file subpoenas in the U.S. District Court, as well.**

Intentionally omitted words from SDWA and/or from USEPA: "USEPA does not regulate private water wells". "Private Water Well is not PUBLIC WATER SYSTEM". In fact, Individual Private Water Well is not Public Water System or public system of any kind. Intentionally twisted word not found therein the SDWA: (given that it supplies the more than 25 "similarly situated Plaintiffs")".

**Asserted by PG&E in quote marks:**

2. Ex. 6 - Personal Privacy arguing obliquely that: "the phrase 'public water systems' excludes water sources which are too small to supply a 'public' water system," and that this exclusion "means that many people using rural and private wells which draw from relatively small sources of groundwater are not protected/regulated under the SDWA."

Ex. 6 - Personal Privacy **strikes the asserted therein quoted Paragraph 2 by PG&E as follows:**

Ex. 6 - Personal Privacy has not, reiterate, has not "obliquely (not in a direct way; indirectly)" asserted any such statements found therein PG&E's Paragraph 2. WHEREFORE PG&E has wantonly and unscrupulously misrepresented the SDWA, in the entirety, thus PG&E is in contempt of the codified into law Statute, the 42 U.S.C. § 300f, et seq. the SDWA.

**Asserted by PG&E in quote marks:**

3. "The Complaint in this case show that the source of groundwater supplying drinking water to Plaintiff and the plaintiffs in the roughly 30 related cases is sufficiently large to be able to supply a PWS.
   Thus, the Hinkley Aquifer is a USDW".
   "(Under the SDWA regulations, an "aquifer" includes not only a single source of groundwater, but also a "group of formations… that is capable of yielding a significant amount of water to a well or spring." 40 C.F.R. § 144.3.
   "An aquifer is a USDW if it fits the definition under144.3, even if it has not been 'identified.'" 40 C.F.R. § 144.1(g)."

Ex. 6 - Personal Privacy **trikes the asserted therein quoted Paragraph 3 by PG&E as follows:**

Whether the source of water is sufficiently large to supply PWS (PUBLIC WATER SYSTEM) or not, **it is irrelevant** as to supplying "plaintiffs in a roughly 30 related cases" since each of those plaintiffs uses only their individual private water wells and not "group of formations", "springs" or any other systems.

Here, PG&E has wantonly and unscrupulously attempted to introduce inapplicable definitions, which is triggering attempt to circumvent the Statute 42 U.S.C. 300f, et seq. and circumvent the authorities delegated to the USEPA by the United States Congress.

**THEREFORE, it is warrant to issue subpoena on PG&E by Congress and by USEPA, to the Statute 42 U.S.C. §300f, et seq., in the entirety, and not limited to Congressional hearing and hearing before USEPA. Nick Panchev should be constitutionally entitled to file subpoenas in the U.S. District Court, as well.**

**Asserted by PG&E in quote marks:**

4. "Plaintiff argues in his Opposition that PG&E is not subject to Part C of the SDWA because it purportedly does not have wells that are classified as Class I through Class V wells under the SDWA."

Ex. 6 - Personal Privacy **rikes the asserted therein quoted Paragraph 4 by PG&E as follows:**

PG&E has not only intentionally omitted to state the entire sentence found therein the Statute 42 U.S.C. §300f, et seq., **"Municipal Wells Class I through Class V", which are "Injection Wells",** and that the PG&E private wells of any kind are not "Municipal Wells Class I through Class V Injection Wells", including but not limited to the fact that PG&E is not a Municipal Water System entity of any kind, but has thwarted and circumvented the Congressional intent as to the Statute 42 U.S.C. §300f, et seq.

**THEREFORE, it is warrant to issue subpoena on PG&E by Congress and by USEPA, to the Statute 42 U.S.C. §300f, et seq., in the entirety, and not limited to Congressional hearing and hearing before USEPA. Nick Panchev should be constitutionally entitled to file subpoenas in the U.S. District Court, as well.**

**Asserted by PG&E in quote marks:**

5. "Moreover, even if the Complaint had alleged that PG&E did not use a classified injection well, Part C prohibits *any* underground injection of contaminants that may impact a USDW, regardless of the type of well—even if the well does not fall within any of the six permitted injection well classifications. The SDWA regulations define "injection well" quite broadly, extending even to "a dug hole that is deeper than the largest surface dimension," used to inject fluids. The regulations prohibit any underground injection done without a classified well permit issued under related SDWA regulations. 40 C.F.R. § 144.11."

Ex. 6 - Personal Privacy **strikes the asserted therein quoted Paragraph 5 by PG&E as follows:**

Here, PG&E is twisting and thwarting the meaning of "Injection Well" per Congressional intent, and is attempting to circumvent the SDWA "Municipal Injection Wells Class I through V" rules and regulations. In fact, if PG&E is, or has injected whatever substances in any of their wells, and did not hold approved by USEPA "PERMIT TO INJECT AS A MUNICIPAL WELL CLASS I THROUGH V ENTITY SUBSTANCES" **has criminally violated SDWA.**

**THEREFORE, it is warrant to issue subpoena on PG&E by Congress and by USEPA, to the Statute 42 U.S.C. §300f, et seq., in the entirety, and not limited to Congressional hearing and hearing before USEPA.**

Ex. 6 - Personal Privacy **hould be constitutionally entitled to file subpoenas in the U.S. District Court, as well.**

**Furthermore, it is warrant for USEPA to instantly initiate criminal investigation of PG&E's acts, all act, in the entirety.**

**Asserted by PG&E in quote marks:**

6. "Thus, even if Plaintiff had alleged that PG&E did not use a well "Classified as Classes I through V," as argued in the Opposition, it would not support the conclusion that the alleged injection of contaminants into the Hinkley Aquifer "has nothing to do with these Sections of the SDWA."

Ex. 6 - Personal Privacy **strikes the asserted therein quoted Paragraph 6 by PG&E as follows:**

These statement by PG&E are not only a wanton and malicious attempt to inject unsupported contentions, with bias intent and prejudice, thus exhibiting the ultimate "Invidious Discrimination under the Fourteenth Amendment of the U.S. Constitution, are not only incomprehensive, not only vague, not only ambiguous, but are construed as the ultimate "twisting-thwarting-circumventing-misleading-misinterpreting, and maliciously being in contempt of not only the Congress, not only USEPA, but the Judicial System, in those 30 cases in the United States District Court Central District of California-Riverside, with the respective presiding judges, the Hon. George H. King and the Hon. Magistrate Judge Kenly Kiya Kato.

**Asserted by PG&E in quote marks:**

7. "Because Plaintiff alleges wrongful injection of chemicals into a USDW, his claims under sections 1983 and 1985(3) are pre-empted by the SDWA."

Ex. 6 - Personal Privacy **strikes the asserted therein quoted Paragraph 7 by PG&E as follows:**

If PG&E contentions are to not concede (confess) of their criminal acts, such as injecting in their wells substances that caused decay of the Arsenic and Uranium, also being the byproducts of PG&E's failed remedial operations, such as Arsenic and Uranium, poisoning the Individual Private Water Wells of Plaintiffs, in this case now "Victims of Crime", wherefore such concealment is a "FELONY", PG&E must be held criminally liable, or else the Government must either declare the entire town of Hinkley as a SUPRFUND SITE, since no chemicals, including Hexavalent Chromium were ever cleaned for the past several decades and such will never be cleaned from the ground drinking water, and THEREFORE, the Government must finally resolve these grave acts by PG&E. Time is of an essence, since almost monthly Victims are dying on remaining population of less than 900 Victims, town of Hinkley, CA.

**CONCLUSION**

Ex. 6 - Personal Privacy has asserted the foregoing under penalty of perjury, and can testify before Congress and United States Environmental Protection Agency (USEPA), as a credible witness under oath, and hereby demand initiated instant investigation by Congress and USEPA.

Dated: September 9, 2016

Ex. 6 - Personal Privacy